

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD A. GORMAN,

Plaintiff,

v.

ILYA SHPETRIK,

Defendant.

Case No.: 2:20-cv-04759-JCJ

**MOTION FOR THE ADMISSION
PRO HAC VICE OF MATTHEW J. PRESS, ESQUIRE**

I, Matthew Faranda-Diedrich, undersigned counsel for Defendant Ilya Shpetrik (“Defendant”), hereby move, pursuant to Local Rule 83.5.2(b) of the Local Rules of Civil Procedure of the United States District Court for the Eastern District of Pennsylvania and item 1(D) of the Court’s Policies and Procedures, for the admission *pro hac vice* of Matthew J. Press, Esquire, a partner in the law firm of Press Koral LLP, as counsel for Ilya Shpetrik¹.

In support of this Motion, I hereby certify as follows:

1. I am an attorney admitted to practice in good standing before this Court.
2. My appearance has been entered in this case.
3. Defendants require this motion because Mr. Press has represented Defendants and is familiar with the facts, circumstances, allegations, and defenses in this matter.
4. Mr. Press is an attorney practicing in the law firm of Press Koral LLP.
5. Mr. Press offers the accompanying Affidavit in support of this Motion.

¹ Defendants enter the appearance of its counsel without waiver of, and expressly preserving, all defenses and objections, including but not limited to as relating to the jurisdiction of this Court.

6. I will serve as associate counsel for Mr. Press pursuant to Local Rule Civ. P.

83.5.2.

7. Mr. Press is an active member in good standing of the bar of the State of New York and he is of the highest professional character.

WHEREFORE, I respectfully request that this Court grant the Motion, admit Mr. Press *pro hac vice* to the Bar of this Court for the purposes of this case only, and enter an Order in the form attached hereto.

Respectfully submitted,

By: /s/ Matthew Faranda-Diedrich

Dated: February 10, 2021

Matthew Faranda-Diedrich, Esquire
PA Id. No. 203541

ROYER COOPER COHEN BRAUNFELD LLC
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100 N. 18th St., Suite 710
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Attorneys for Defendant Ilya Shpetrik

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for the Admission *Pro Hac Vice* of Matthew J. Press has been filed electronically and is available for viewing and downloading from the ECF system to all counsel of record.

By: /s/ Matthew Faranda-Diedrich
Matthew Faranda-Diedrich, Esquire
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